

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Docket No.: 04-Cv-11340DPW

STEPHEN KEEFE,  
Plaintiff

v.

LOCALS 805, INTERNATIONAL  
LONGSHOREMEN'S ASSOCIATION,  
AFL-CIO, et. al,  
Defendants

**DEFENDANTS' [UNOPPOSED] MOTION FOR EXTENSION OF TIME TO  
FILE AN OPPOSITION TO THE PLAINTIFF'S MOTION FOR SANCTIONS**

NOW COME the Defendants in the above-referenced matter, and hereby move this Honorable Court to allow for an extension of time for the filing of an opposition to the Plaintiff's Motion for Sanctions. As reasons wherefore, the Defendants state the following:

1. Counsel for the Defendants, Michael L. Mahoney, has only recently entered his appearance on behalf of the Defendants, following the withdrawal of predecessor counsel on this case.
2. The Plaintiff's Motion for Sanctions was filed prior to Attorney Mahoney's entrance into the case as defense counsel.
3. Counsel for the Defendants only received a copy of the Plaintiff's Motion for Sanctions at the time that his appearance was entered.

4. Following the Notices of Appearance being entered of Michael L. Mahoney on behalf of the Defendants, the Court scheduled a Status Conference before Judge Douglas P. Woodlock on November 10, 2005.
5. The Defendants would request that they be allowed to submit their Opposition Motion (if necessary) after the Status Conference scheduled in this case.
6. As Plaintiff counsel has indicated that he will not be opposing the Defendants' Motion for Extension, no party will be prejudiced by the allowance of this Motion.

WHEREFORE, the Defendants respectfully request that their Motion for an Extension of Time to file an Opposition to the Plaintiff's Motion for Sanctions be allowed.

Dated: November / , 2005

Respectfully submitted,  
The Defendants,  
Locals 805, International  
Longshoremen's Association, AFL-  
CIO, et al,



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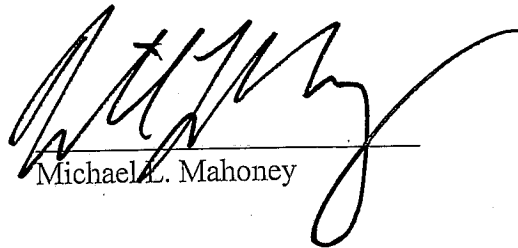
**CERTIFICATE OF SERVICE**

I, Michael L. Mahoney, hereby certify that I have served a true copy of the within document this 1 day of November, 2005, via electronic mail, postage prepaid upon the following:

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